

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CLAIRE DOUGLAS and MARY JOAN
ISABELL, individually, on behalf of
similarly situated individuals,

Plaintiffs,

v.

BANK OF AMERICA, N.A., a national
banking association,

Defendant.

No. 2:20-cv-00193-JLR

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINE
FOR RENEWED MOTION FOR
CLASS CERTIFICATION**

Noted for Consideration:
May 6, 2021

I. BACKGROUND

In an Order filed on November 19, 2020, the Court, *inter alia*, (1) granted Plaintiffs' motion to amend their complaint, (2) denied without prejudice Plaintiffs' motion for class certification and (3) set new deadlines for specified class-related actions. *See* Dkt. No. 100. Pursuant to that Order a renewed motion for class certification was to be filed by February 22, 2021.

After Plaintiffs filed their amended complaint on December 3, 2020, Dkt. No. 101, the parties entered serious settlement discussions. To facilitate those discussions, the parties jointly stipulated to the extension of that deadline to April 22, 2021, which the

1 Court approved in an Order entered on January 11, 2021. Dkt. No. 104. As settlement
2 discussions continued fruitfully, the parties jointly stipulated to the extension of the
3 deadline to May 6, 2021, which the Court approved in an Order entered on April 26,
4 2021. Dkt. No. 110. With a handful of days left before the passage of that deadline, the
5 parties' counsel reached agreement on the language of proposed settlement agreements
6 (one primarily for the named Plaintiffs and others for putative class members -
7 "claimants" - not named as Plaintiffs in the Second Amended Complaint). Plaintiffs'
8 counsel is in the process of reviewing these agreements with plaintiffs and claimants.
9 However, more time is required for Plaintiffs' counsel to review these 19 separate
10 agreements (several of which are applicable to multiple plaintiffs or claimants) fairly and
11 adequately with each of their proposed signatories.

12 Accordingly, the parties have agreed to jointly request an extension of the
13 pending class certification motion deadline to June 3, 2021 to facilitate that process.
14
15
16
17
18
19
20
21
22
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

II. STIPULATION

The parties agree that, subject to Court approval, the deadline for Plaintiffs to renew their motion for class certification set forth in Dkt. No. 110 should be extended to June 3, 2021.

DATED: May 6, 2021.

SIRIANNI YOUTZ
SPOONEMORE HAMBURGER PLLC

PAINE HAMBLÉN

/s/ Daniel S. Gross
Richard E. Spoonemore, WSBA #21833
Chris R. Youtz, WSBA #7786
Daniel S. Gross, WSBA #23992
3101 Western Avenue, Suite 350
Seattle, WA 98121
Tel.: (206) 223-0303
Email: rick@sylaw.com
Email: chris@sylaw.com
Email: daniel@sylaw.com
Attorneys for Plaintiffs

/s/ Garrett J. Williams
Kelly D. Folger, WSBA #39407
Garrett J. Williams, WSBA #52902
717 W. Sprague Avenue, Suite 1200
Spokane, WA 99201
Telephone: (509) 455-6000
Email: kdf@painehamblen.com
Email: gjw@painehamblen.com
Attorneys for Defendant
BANK OF AMERICA, N.A.

ATTORNEY WEST SEATTLE

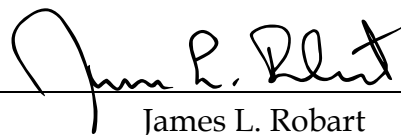
/s/ Eric J. Harrison
Eric J. Harrison, WSBA #46129
5400 California Avenue SW
Seattle, WA 98136
Tel. (206) 388-8092
Email: eric@attorneywestseattle.com
Attorneys for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

III. ORDER

Based on the stipulation of the parties and for good cause shown, the deadline for Plaintiffs to file a renewed motion for class certification shall be extended from May 6, 2021 to June 3, 2021.

DATED this 7th day of May 2021.



James L. Robart
United States District Judge